



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

ZACHARY W. CARTER
Corporation Counsel

DAVID COOPER
Senior Counsel
phone: (212) 356-2579
fax: (212) 356-3509
email: dcooper@law.nyc.gov

January 30, 2019

VIA ECF

The Honorable Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *David Floyd, et al. v. City of New York*, 08 CV 1034 (AT);
Kelton Davis, et al. v. City of New York, et al., 10 CV 699 (AT);
Jaenean Ligon, et al. v. City of New York, et al., 12 CV 2274 (AT)

Your Honor:

I am a Senior Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney assigned to the above-referenced matter on behalf of defendant City of New York ("City"), writing on behalf of the New York City Police Department ("NYPD"). The NYPD submitted its plan to implement Facilitator's Recommendation No. 1 ("Plan") on January 14, 2019, and plaintiffs' counsel in *Floyd, Davis*, and *Ligon* filed their responses to the Plan on January 28, 2019. The NYPD respectfully requests that the Court grant it leave to file a response to the concerns expressed by plaintiffs' counsel by **February 8, 2019**. Counsel for plaintiffs in *Floyd, Davis*, and *Ligon* consent to this request.

Thank you for your time and consideration.

Respectfully submitted,

/s/

DAVID COOPER
Senior Counsel
Special Federal Litigation Division

cc: **VIA ECF**
All Parties on Record